

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ JUN 29 2017 ★

BROOKLYN OFFICE

JD:DGR  
F. #2016R00461

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

CHRISTOPHER ARROYO,

Defendant.

SUPERSEDING  
INFORMATION

Cr. No. 16-376 (S-1) (JBW)  
(T. 18, U.S.C., §§ 2422(b), 2428(a) and  
3551 et seq.; T. 21, U.S.C., § 853(p))

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THE UNITED STATES ATTORNEY CHARGES:

COERCION AND ENTICEMENT OF A MINOR  
TO ENGAGE IN ILLEGAL SEXUAL ACTIVITY

1. In or about and between 2012 and 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant CHRISTOPHER ARROYO, using one or more facilities and means of interstate and foreign commerce, to wit: the Internet and mobile Internet applications, did knowingly and intentionally persuade, induce, entice and coerce an individual who had not attained the age of 18 years, to wit: Jane Doe, an individual whose identity is known to the United States Attorney, to engage in sexual activity for which a person could be charged with a criminal offense, to wit: promoting a sexual performance by a child, in violation of New York State Penal Law Section 263.15.

(Title 18, United States Code, Sections 2422(b) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2428(a), which requires the forfeiture of (a) any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offense; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense, including but not limited to:

- (a) one (1) Toshiba Laptop, serial number 9D053762S;
  - (b) one (1) Nintendo Wii with SanDisk USB 8GB, serial number GW400570998;
  - (c) one (1) Xbox 360 HDD Console, serial number 416713661705;
  - (d) one (1) Fujitsu hard drive, model number MHW2040BH, serial number K11LT792KFDM;
  - (e) one (1) PNY thumb drive 64GB;
  - (f) one (1) Huawei My Touch cellphone, IMEI 861148011492910, serial number C527NC9370302567;
  - (g) one (1) Xbox One Console, serial number 044637451048; and
  - (h) one (1) Xbox Console, serial number 04329242806,
- all seized on or about February 25, 2016.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:


- (a) cannot be located upon the exercise of due diligence;

- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2428(a); Title 21, United States Code, Section 853(p))



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BRIDGET M. ROHDE  
ACTING UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F. # 2016R00461  
FORM DBD-34  
JUN. 85

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

*CHRISTOPHER ARROYO,*

Defendant.

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**SUPERSEDING INFORMATION**

(T. 18, U.S.C., §§ 2422(b), 2428(a) and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p))

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*A true bill.*

\_\_\_\_\_  
*Foreperson*

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

Bail, \$ \_\_\_\_\_

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*Drew G. Rolle, Assistant U.S. Attorney (718) 254-6783*